

FILED

SEP 30 2015

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

PAUL COLE,
CARLIE COLE, and
JAMIE COLE,

Defendants.

4:15CR444 CDP/TCM

INDICTMENT

COUNT I

The Grand Jury charges that:

Beginning around 2011 and continuing thereafter to the date of this Indictment, in the Eastern District of Missouri and elsewhere, the defendants,

**PAUL COLE,
CARLIE COLE,
and
JAMIE COLE**

did knowingly and willfully conspire, combine, confederate and agree with each other and with other persons known and unknown to this Grand Jury, to commit offenses against the United States, to wit: to distribute and possess with intent to distribute a mixture or substance containing a detectable amount of oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846 and punishable under Title 21, United States Code, Section 841(b)(1)(C).

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 21, United States Code Section 853(a), upon conviction of an offense in violation of Title 21, United States Code, Sections 841(a)(1) and 846 as set forth in Count I, the defendants listed in Count I shall forfeit to the United States of America any property, real and personal, constituting or derived from any proceeds obtained directly or indirectly as a result of said offenses, and any property used, or intended to be used, in any manner or part to commit or facilitate the commission of said offenses.

2. Subject to forfeiture is a sum of money equal the total value of any property, real or personal involved in transactions or attempted transactions in furtherance of the offense charged in Count I.

3. Specific property subject to forfeiture in Count I includes, but is not limited to, the following:

- a. \$65,000.00 seized on or about January 16, 2014,
- b. \$13,200.00 seized on or about April 29, 2014,
- c. 2006 Jeep Cherokee, VIN: 1J4GR48K26C152493 seized on or about April 29, 2014;
- d. 2005 Nissan Armada, VIN: 5N1AA08B25N737648 seized on or about January 17, 2014.

4. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;

- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to 21 U.S.C. § 853(p).

A TRUE BILL.

FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

Stephen Casey #58879MO
Assistant United States Attorney